

**AFFIDAVIT OF CHRISTOPHER BRICKHOUSE**

1. I am an adult over the age of eighteen (18) and legally competent to testify.
2. I am executive director of Better Days Ahead Outreach Inc. (“Better Days Ahead”) and have been serving in this role since around 2021.
3. Better Days Ahead is a non-profit organization with the mission of aiding unhoused residents in Pottstown and other Southeastern PA municipalities, including by distributing food, tents, sleeping bags, clothing, and other critical supplies to them.
4. Among the homeless encampments that Better Days Ahead serves is the encampment located on Borough of Pottstown-owned land next to the Schuylkill River Trail along College Drive, Pottstown, PA (the “College Drive Encampment”).
5. I and other Better Days Ahead volunteers visit the College Drive Encampment to distribute food and other supplies approximately twice per month.
6. Unhoused residents in the Borough of Pottstown, including at the College Drive Encampment, depend on Better Days Ahead and other organizations to stay fed and sheltered.
7. I estimate that approximately half of the unhoused residents in the Borough of Pottstown stay sheltered from the elements with tents supplied by Better Days Ahead.
8. Over the past two years, there have been homeless encampment sweeps in areas we serve in Southeastern Pennsylvania.
9. Past sweeps by Southeastern Pennsylvania municipalities have frustrated Better Days Ahead’s mission by making it more difficult for our organization to locate and provide life-sustaining supplies to the unhoused residents that we serve.
10. Past sweeps have also forced Better Days Ahead to divert resources by requiring us 1) to supply unhoused residents with new tents, and 2) to devote time and energy to locating the residents that we serve.

11. If the Borough of Pottstown goes forward with its plan to close the College Drive Encampment without offering residents alternative housing, it will frustrate Better Days Ahead's mission and cause irreparable harm to Better Days Ahead by scattering the College Drive Encampment residents and making it harder for us to find and deliver life-sustaining supplies to the residents that we serve there.
12. If the Borough of Pottstown goes forward with closing the College Drive Encampment, it will also force Better Days Ahead to divert resources by requiring us to spend time and energy finding the College Drive Encampment residents that we serve.
13. Without the life-sustaining supplies, such as food, sleeping bags, and tents, that Better Days Ahead provides, some or all College Drive Encampment residents will likely be at immediate risk of hunger and exposure to the cold.

I declare under the penalty of perjury that the above is true and correct to the best of my knowledge, information, and belief.



\_\_\_\_\_  
Christopher Brickhouse

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Date 10/26/2023